

EMILY P. RICH, Bar No. 168735
TRACY L. MAINGUY, Bar No. 176928
CAITLIN GRAY, Bar No. 305118
WEINBERG, ROGER & ROSENFELD
A Professional Corporation
1001 Marina Village Parkway, Suite 200
Alameda, California 94501
Telephone (510) 337-1001
Fax (510) 337-1023
E-Mail: bankruptcycourtnotices@unioncounsel.net
erich@unioncounsel.net
tmainguy@unioncounsel.net
cgray@unioncounsel.net

Attorneys for Creditor Engineers and Scientists of California, Local
20, IFPTE

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

In Re
PG&E CORPORATION,
Debtor.

Case Nos. 19-30088 and 19-30089
CHAPTER 11
(Joint Administration Pending)

In Re
PACIFIC GAS AND ELECTRIC COMPANY,
Debtor,

**ENGINEERS AND SCIENTISTS OF
CALIFORNIA LOCAL 20, IFPTE'S
STATEMENT IN SUPPORT OF
INTERIM RELIEF REQUESTED IN
DEBTORS' EMPLOYEE WAGES AND
BENEFITS MOTION AND
RESERVATION OF RIGHTS**

Date: January 31, 2019
Time: 10:00 a.m.
Place: Courtroom 17
450 Golden Gate Ave., 16th Floor,
San Francisco, CA

Engineers and Scientists of California Local 20, IFPTE ("ESC Local 20"), the exclusive collective bargaining representative of over 3,700 of Debtors' professional and technical employees pursuant to a collective bargaining agreement with the Debtors, hereby submits this Statement of Support of Interim Order and Reservation of Rights in response to the Motion of

Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507 and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to (I) Pay Prepetition Wages, Salaries, Withholding Obligations, and Other Compensation and Benefits; (II) Maintain Employee Benefits Programs; and (III) Pay Related Administrative Obligations (the “Employee Wages and Benefits Motion”) (Doc. 8).

ESC Local 20 represents the engineers, estimators, mappers, project managers, and other professional and technical employees that have been doing the important work needed to maintain and modernize the systems and keep the public utility safe. As the Debtors have recognized, its employees “are the lifeblood of the Debtors’ businesses—without them, the Debtors’ operations would come to a halt” and “the Debtors’ customers in northern and central California would not receive essential utility services.” Doc. 8, p. 12. A disruption in these employees’ earned wages and benefits would expose these employees to serious financial difficulties and could result in instability in the workforce—a risk that would be especially consequential given both the highly specialized nature of many of the duties the employees perform and the critical nature of the Debtors’ business as the sole utility provider to approximately 16 million customers. Accordingly, the Debtors should be permitted to honor prepetition obligations to these employees and maintain existing Employee Wage and Benefits Programs.

ESC Local 20 supports entry of the proposed interim order authorizing Debtors to pay prepetition wages, salaries, withholding obligations and other compensation and benefits, and authorizing the Debtors to maintain its Employee Wage and Benefits Programs (Doc. 8-1). ESC Local 20 has certain questions related to the Employee Wages and Benefits Motion that it will address with the Debtors before the entry of a final order, and therefore reserves all rights with respect to entry of a final order.

Dated: January 30, 2019

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: /s/ Emily P. Rich
EMILY P. RICH

Attorneys for Creditor Engineers and Scientists of
California, Local 20, IFPTE

147061\1008245

2

1 **CERTIFICATE OF SERVICE**

2 I am a citizen of the United States and an employee in the County of Alameda, State of
3 California. I am over the age of eighteen years and not a party to the within action; my business
4 address is 1001 Marina Village Parkway, Suite 200, Alameda, California 94501.

5 I hereby certify that on January 30, 2019, I electronically filed the forgoing STATEMENT
6 IN SUPPORT OF INTERIM RELIEF REQUESTED IN DEBTORS' EMPLOYEE WAGES
7 AND BENEFITS MOTION AND RESERVATION OF RIGHTS with the U.S. Bankruptcy
8 Court, Northern District California, by using the Court's CM/ECF system.

9 Pursuant to controlling General Orders and LBR, the foregoing document will be served
10 by the court via NEF and hyperlink to the document. On January 30, 2019, I checked the
11 CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the
12 following persons are on the Electronic Mail Notice List to receive NEF transmission at the email
13 addresses stated below:

14 SEE ATTACHED SERVICE LIST

15 On (date) January 30, 2019, I served the following persons and/or entities at the last
16 known addresses in this bankruptcy case or adversary proceeding by placing a true and correct
17 copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and
18 addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will
19 be completed no later than 24 hours after the document is filed.

20 SEE ATTACHED SERVICE LIST

21 I certify under penalty of perjury that the above is true and correct. Executed at Alameda,
22 California, on January 30, 2019.

23
24
25
26 /s/ Stephanie Mizuhara
Stephanie Mizuhara

SERVICE LIST

- Peter J. Benvenuti pbenvenuti@kellerbenvenuti.com
- Shawn M. Christianson schristianson@buchalter.com
- Jonathan R. Doolittle jdoolittle@reedsmith.com, bgonshorowski@reedsmith.com
- David V. Duperrault dvd@svlg.com, edn@svlg.com
- Joseph A. Eisenberg jae@jmbm.com, bt@jmbm.com
- Michael P. Esser michael.esser@kirkland.com
- James J. Ficenec jficenec@archernorris.com, ybullock@archernorris.com
- John D. Fiero jfiero@pszjlaw.com, ocarpio@pszjlaw.com
- Mark A. Gorton mgorton@boutininc.com, cdomingo@boutininc.com
- Debra I. Grassgreen dgrassgreen@pszjlaw.com, hphan@pszjlaw.com
- Roberto J. Kampfner rkampfner@whitecase.com
- Tobias S. Keller tkeller@kellerbenvenuti.com, pbenvenuti@kellerbenvenuti.com
- Lynette C. Kelly lynette.c.kelly@usdoj.gov, ustpregion17.oa.ecf@usdoj.gov
- Samuel M. Kidder skidder@ktbslaw.com
- Jane Kim jkim@kellerbenvenuti.com
- Thomas F. Koegel tkoegel@crowell.com
- Andy S. Kong kong.andy@arentfox.com
- Richard A. Lapping rich@trodelalapping.com
- John William Lucas jlucas@pszjlaw.com, ocarpio@pszjlaw.com
- Kerri Lyman klyman@irell.com, lgauthier@irell.com
- John H. MacConaghy macclaw@macbarlaw.com, smansour@macbarlaw.com; kmuller@macbarlaw.com
- Thomas C. Mitchell temitchell@orrick.com
- David L. Neale dln@lnbrb.com
- Gregory C. Nuti gnuti@nutihart.com, nwhite@nutihart.com
- Office of the U.S. Trustee / SF USTPRegion17.SF.ECF@usdoj.gov
- Valerie Bantner Peo vbantnerpeo@buchalter.com
- Danielle A. Pham danielle.pham@usdoj.gov
- Thomas R. Phinney tom@parkinsonphinney.com
- R. Alexander Pilmer alexander.pilmer@kirkland.com, keith.catuara@kirkland.com
- M. Ryan Pinkston rpinkston@seyfarth.com, jwoods@seyfarth.com
- Douglas B. Provencher dbp@provlaw.com
- Lary Alan Rappaport lrappaport@proskauer.com, PHays@proskauer.com
- Justin E. Rawlins jrawlins@winston.com
- Gregory A. Rougeau grougeau@brlwsf.com
- David B. Shemano dshemano@pwkllp.com
- James A. Shepherd jim@elkshep.com, ecf@elkshep.com
- Michael St. James ecf@stjames-law.com
- David M. Stern dstern@ktbslaw.com
- Meagan S. Tom Meagan.tom@lockelord.com, autodocket@lockelord.com
- Edward Tredinnick etredinnick@grmslaw.com
- Marta Villacorta marta.villacorta@usdoj.gov

- John A. Vos InvalidEMailECFonly@gmail.com, PrivateECFNotice@gmail.com
- Genevieve G. Weiner gweiner@gibsondunn.com
- Kimberly S. Winick kwinick@clarktrev.com, knielsen@clarktrev.com
- Kirsten A. Worley kw@wlawcorp.com, admin@wlawcorp.com

VIA U.S. MAIL

Arocles Aguilar
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Andrew Yaphe
Davis Polk & Wardwell LLP
1600 El Camino Real
Menlo Park, CA 94025